



MONTANA  
CATTLEMEN'S ASSN.  
*Working For Cattle Producers*

# MONTANA CATTLEMEN'S ASSOCIATION

With A "Steak" In Montana's Future

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April 9, 2003

Country of Origin Labeling Program  
Agricultural Marketing Service  
USDA Stop 0249  
Room 2092-S  
1400 Independence Avenue, S.W.  
Washington, D.C. 20250-0249

Via E-Mail: [cool@usda.gov](mailto:cool@usda.gov) and Facsimile: 202-720-3499

**Re: Comments on COOL – Proposed Guidelines**

Gentlemen:

**Introduction:**

Montana Cattlemen's Association (MCA) is a grass roots family organization representing cattle producers within the State of Montana. MCA previously submitted comments on the proposed voluntary COOL program. The organization is pleased to take this opportunity to provide the following additional comments.

**Affiliation with R-CALF USA:**

MCA is a state affiliate of R-CALF USA. We have had the opportunity to provide input to and support for the comments submitted by R-CALF USA. We make reference to those comments and incorporate those comments herein by reference; specifically MCA strongly supports the implementation of COOL. Both cattle producers and consumers within Montana support COOL as set forth in the 2002 Farm Bill.

**Additional Supplemental Comments:**

MCA supports what has become widely known within the cattle industry as the CATTLE EXCLUSIONARY RULE. Specifically, all cattle should be eligible as USA product unless otherwise excluded. This approach will reduce the cost of implementation of the program to a minimal amount. It will relieve U.S. cattle producers of mandatory identification protocols and allow for the smooth implementation of the COOL legislation. All live cattle and beef imported into the U.S. are already readily identified in extensive documentation and inspection. All other cattle and beef within the U.S. are wholly domestic product. In effect, MCA asks the USDA to utilize the protocol already in place to identify all cattle and beef that will not be defined as USA beef and cattle.

In the case of mixed product (ground beef), the packing industry already has in place the mechanism of tracking the proportions of foreign beef and domestic beef as the final product is prepared for the marketplace. Utilize the information already available and there is no need to “reinvent the mouse trap.”

**Bioterrorism Act of 2002:**

The Bioterrorism Act of 2002, which will become law on December 12, 2003, will be implemented by the Homeland Security Office. The Act has been fully funded. The Act will require among many things that all live animals imported into the U.S. be identified as to their country of origin. Further, in the case of “trans-shipped” animals, all countries through which the animal passes must be reported to the Food and Drug Administration which is charged with the responsibility of tracking these animals, including cattle. The Act will require five days notice to FDA of an importer’s intent to import cattle. The Act requires the tracking of live animals after they enter the country.

MCA urges that the protocol being contemplated by the Homeland Security Office to accomplish the requirements of the Act be devised in a manner that the information required be made available to USDA. This additional database should provide the information necessary to smoothly track all live cattle imported into the U.S. Again, Congress has fully funded this Act. The sharing of U.S. government information should result in minimal cost to U.S. cattle producers to implement COOL.

Under the Bioterrorism Act, FDA is not required to track beef imported into the USA. This exemption recognized the USDA already had in effect an efficient method for tracking imported beef.

**Conclusion:**

MCA urges that COOL be implemented in a manner which provides the least expense and intrusion into the business practices of U.S. cattle producers.

MCA thanks USDA for the opportunity to submit these additional comments.

Regards,

A handwritten signature in cursive script, appearing to read "Paul Ringling".

Paul Ringling  
President